



# Pascazi Law Offices PLLC

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October 16, 2023

## VIA ECF

United States District Court  
Southern District of New York  
Hon. Katherine Polk Failla, U.S.D.J.  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

Re: Mene v. Sokola, Case No.: 22-cv-10333 (KPF); Letter Motion to Modify Certain Deadlines on Consent

Dear Judge Polk Failla,

This office represents Petitioner, Sebastien Funez Mene, in this Hague Abduction Convention proceeding.

I write on consent of Respondent's Counsel.

When attempting to produce a Pretrial Findings of Fact and Conclusions of Law this evening, it became obvious to me that I do not have: A trial witness list from Respondent, do not have trial witness affidavits/declarations from Respondent, and do not have a trial exhibit list with brief descriptions of said exhibits from Respondent, all of which are needed in my view to prepare a proper Findings of Fact and Conclusions of Law. I suspect that the same could be said of Respondent's Counsel not having items from Petitioner given the flow of the current schedule of events.

*Ergo*, I now seek the following schedule of events for the remainder of this week:

- Tuesday 10/17/23:  
Joint Pretrial Order, Trial Witness Lists, and Trial Exhibits Lists to be filed;
- Wednesday 10/18/23:  
Exchange and Email of Trial Witness Affidavits and Actual Exhibits;
- Friday 10/20/23 (by Noon):  
Proposed Findings of Fact and Conclusions of Law to be filed.

I Thank the Court in advance for its courtesies in this matter.

Very truly yours,

/s/ *Michael S. Pascazi*

Michael S. Pascazi, ESQ.

c.c.: Opposing Counsel via ECF  
Sebastien Mene via E-Mail

MSP/

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Application GRANTED. The Court hereby ADJOURNS the deadlines for pre-trial submissions in this case in accordance with the schedule set forth above. The Court will grant no further extensions of such deadlines.

The Clerk of Court is directed to terminate the motion at docket entry 73.

SO ORDERED.

Dated: October 17, 2023  
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE